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Lead Plaintiffs' Counsel

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
ANNMARIE MALLOZZI, individually and on
behalf of all others similarly situated,

CASE No.: 07-CV-10321 (GBD)

Plaintiff,

v.

INDUSTRIAL ENTERPRISES OF AMERICA,
INC.; JOHN MAZZUTO; JORGE YEPES;
DENNIS O'NEILL; and JAMES MARGULIES,

Defendants.

-----X

LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR:

**(1) FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT; AND
(2) AWARD OF COUNSEL FEES AND REIMBURSEMENT OF EXPENSES**

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT ON May 18, 2011, at 10:00 a.m., lead plaintiffs will and hereby do move the Court of the Hon. George B. Daniels for final approval of the proposed class action settlement and an award of counsel fees and reimbursement of expenses.

This motion is based upon this notice of motion and motion, the accompanying memorandum of points and authorities, the accompanying declaration of Phillip Kim in support of the motion, the exhibits attached thereto, and such argument and additional papers as may be submitted to the Court before and at the hearing on this motion.

Dated: April 20, 2011

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Laurence Rosen, Esq. (LR 5733)
Phillip Kim, Esq. (PK 9384)

-and-

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CERTIFICATE OF SERVICE

I hereby certify that on this on the 20th day of April, 2011, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim, Esq.
Phillip Kim, Esq.